

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

NETRAYA L. RICE, and VIRGIINA L. REED	)	
Individually and on behalf of others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	Case No. 3:12-cv-01192
vs.	)	
	)	Judge Campbell/Brown
CELLCO PARTNERSHIP d/b/a VERIZON	)	
WIRELESS,	)	
	)	
Defendant.	)	

---

**JOINT MOTION TO EXTEND DEADLINES**

---

The parties hereby move the Court to extend the deadline set forth in the August 22, 2014 case management order to file briefs on the issue of preemption, which was set for December 12, 2014, until March 12, 2015. (Dkt. No. 105.) Through private mediation, conducted with respected mediator Michael Russell, the parties have agreed to settle this action. The parties have agreed on all material issues and are in the process of finalizing a formal settlement agreement. As such, good cause exists for the Court to modify the scheduling order in this limited respect. Further, the parties anticipate providing a joint motion for approval of the settlement to the Court within sixty days.

This extension serves the interests of justice by conserving the resources of all involved. The parties would further show that this Motion is not interposed for reasons of delay.

Respectfully submitted,

/s/ Randall Burton

---

Morgan E. Smith (26601)  
144 Second Avenue, North  
Suite 201  
Nashville, Tennessee 37201  
Telephone: (615) 620-5848  
Facsimile: (615) 244-9231

Randall W. Burton (15393)  
144 Second Avenue, North  
Suite 212  
Nashville, Tennessee 37201  
Telephone: (615) 620-5838

*Counsel for Plaintiffs*

/s/ Heather Dechert

---

Stanley Weiner\*  
(Ohio State Bar No. 0083382)  
Heather L. Dechert\*  
(Ohio State Bar No. 0086918)  
JONES DAY  
901 Lakeside Avenue  
Cleveland, Ohio 44114-1190  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
sweiner@jonesday.com

Brian Jorgensen\*  
(Texas State Bar No. 24012930)  
JONES DAY  
2727 N. Harwood Street  
Dallas, Texas 75201-1568  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
bmjorgensen@jonesday.com

Andrew S. Naylor (17128)  
Waller Lansden Dortch & Davis, LLP  
511 Union Street, Suite 2700  
Nashville, TN 37219

\* admitted pro hac vice

*Counsel for Defendant Cellco Partnership d/b/a  
Verizon Wireless*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2014, I electronically filed the above using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys:

Morgan E. Smith  
Law Office of Morgan Smith  
144 2nd Avenue North  
Suite 201  
Nashville, TN 37201  
(615) 620-5848  
Fax: (615) 244-9231  
Email: morgan@lawonyourschedule.com

Randall W. Burton  
Jackson & Burton, PLLC  
144 Second Avenue, N  
Suite 212  
Nashville, TN 37201  
(615) 620-5838  
Email: randallwburton@gmail.com

Attorneys for Plaintiffs

\_\_\_\_\_  
/s/ Heather Dechert

Heather L. Dechert  
Attorney for Defendant Cellco Partnership  
d/b/a Verizon Wireless